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# DOCKET FILE COPY ORIGINAL Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

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In the Matters of:	OFFICE OF THE SECRETARY  )
Amendment of the Commission's Rules to Establish Rules and Policies Pertaining to Mobile-Satellite Service and Radio Determination Satellite Service in the 1610-1626.5 MHz and 2483.5-2500 MHz Bands; and	) CC Docket No. 92-166 ) ) )
Amendment of Section 2.106 of the Commission's Rules to Allocate the 1610-1626.5 MHz and the 2483.5-2500 MHz Bands for Use by the Mobile-Satellite Service, Including Non-Geostationary Satellites.	ET Docket No. 92-28 ) ) ) ) )
Implementation of Section 309(j) of the Communications Act Competitive Bidding	) PP Docket No. 93-253

#### **EX PARTE PRESENTATIONS**

Pursuant to Section 1.1206 of the Commission's rules and regulations, Motorola Satellite Communications, Inc. ("Motorola") and Loral Qualcomm Satellite Services, Inc. ("LQSS") hereby report that ex parte presentations were made by representatives of Motorola and LQSS on January 5, 1994, to the persons identified on the attached list. The subject matters discussed during these presentations are reflected in the Joint Comments filed on October 7, 1993, by Motorola and LQSS in CC Docket No. 92-166 and ET Docket No. 92-28, and the separate Comments and Reply Comments filed on November 10 & 30, 1993 by Motorola and LQSS in PP Docket No. 93-253. The participants also discussed the matters covered in the attached materials.

No. of Copies rec'd List A B C D E

Copies of this notice are being filed with the Secretary and are being sent to the persons identified on the attached list.

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#### List of Persons Attending Presentations

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## Comparison of Elements of a Consensus (Motorola/Loral Qualcomm) and TRW Spectrum Sharing Plans

#### Common Elements of Both Plans

- 1. Avoids use of auctions to assign licenses
- 2. Permits both CDMA and bidirectional FDMA systems to operate in the bands
- 3. Limits use of bands to non-geostationary satellite systems
- 4. Access to spectrum would be limited to pending applicants
- 5. Authorizes construction of systems capable of operating across the available bandwidth
- 6. Imposes rigid construction milestones that would be strictly enforced
- 7. Bidirectional FDMA/TDMA system would have access to top portion of 1610-1626.5 MHz band
- 8. CDMA systems would be able to combine their spectrum assignments and share their portion of the L and S bands
- 9. U.S. government must get Russian Federation to reconfigure GLONASS to operate below 1610 MHz and thereby open up entire 1610-1626.5 MHz band for MSS operations

#### **Key Differences In Sharing Plans**

#### Elements of a Consensus Plan

Spectrum would be assigned initially on a "start big and cut back" basis as each system becomes operational. Available spectrum would be divided among operational systems in proportion to their number. Later, periodic adjustments of spectrum assignments would be made based upon actual usage.

- Ensures that spectrum resource will be used to its fullest at all times
- Self adjustment mechanism for assigning spectrum to systems most in need of it
- Eliminates possibility of trafficking in FCC authorizations since only operational systems get any spectrum
- Makes no assumptions as to which technology and how many systems will prevail in the marketplace

#### TRW Plan

Guarantees access to portion of spectrum based solely upon access technique (FDMA/TDMA vs. CDMA). Reserves for possible future assignment a substantial portion of available spectrum

- A priori division of spectrum inappropriate since do not know today how many of each type of system will ever become operational
- By basing spectrum
   assignments on access
   technologies does not
   necessarily reflect spectrum
   needs of particular systems
   and could result in an
   imbalance among systems in
   terms of spectrum
   assignments
- Should not be reserving spectrum in view of existing scarcity and current demand

#### Key Differences In Sharing Plans

#### Elements of a Consensus Plan

### Rigid financial and technical qualifications standards

- Ensures that only those entities ready, willing and able to proceed with business plans get an authorization
- Ensures that only spectrum efficient systems are built
- Eases international coordination of systems since only real systems would have to be coordinated with foreign systems
- Ensures that all of CONUS is served all of the time

#### TRW Plan

Minimal qualification standards, relying instead on construction and launch milestones to weed out applicants.

- Will allow those entities not serious about going forward to traffic in an FCC authorization
- Will cause unnecessary international coordination problems for the U.S. since coordination will likely include systems that will never become operational
- Will allow for inefficient systems without complete coverage of CONUS to use spectrum at expense of high capacity, full coverage systems